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LAW FIRM, LLC

USDC SDNY

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March 28, 2023

BY ECF

Hon. Analisa Torres, U.S.D.J.
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Askmo v. D.B.F. Collection Corp.*
Case No.: 1:22-CV-00565-AT-SDA

Dear Judge Torres:

This firm represents defendant in the above referenced matter in which plaintiff has filed a motion for summary judgment ("Motion").

I respectfully submit this letter motion requesting that the current March 31, 2023 deadline for defendant to file opposition to the Motion be extended by two weeks to April 14, and that the April 14, 2023 deadline for plaintiff to file a reply be extended (per plaintiff's counsel's requirement) to May 12.

The reason for this request is we have learned that the father of defendant's principal, David Friedman, passed away on March 24. Between funeral arrangements and religious obligations thereafter, Mr. Friedman is completely unavailable this entire week until sometime well into next week at the very earliest.

We had planned on Mr. Friedman's participation this week in completing defendant's opposition to the Motion. As this will not be possible, we respectfully ask Your Honor's understanding and indulgence for this relatively brief extension of defendant's deadline for filing opposition in order to ensure Mr. Friedman's availability (and ability) to participate in same.

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There has been no previous request for the extension of the current March 31 and April 14 deadlines on the Motion. Plaintiff consents to the extensions requested herein.

Defendant thanks Your Honor for your kind consideration of its request in this matter.

Respectfully yours,


Charles D. Hellman

cc: Torres_NYSDChambers@nysd.uscourts.gov (courtesy copy)
Abel L. Pierre, Esq. (by ECF)

GRANTED. By **April 21, 2023**, Defendant shall file its opposition. By **May 12, 2023**, Plaintiff shall file his reply, if any.

SO ORDERED.

Dated: March 28, 2023
New York, New York



ANALISA TORRES
United States District Judge